



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL
AND PUBLIC AFFAIRS

May 13, 2016

Cecilia R. Seesholtz, Forest Supervisor
Boise National Forest
1249 South Vinnell Way, Suite 200
Boise, Idaho 83709

Dear Ms. Seesholtz:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the proposed Becker Integrated Resource Project located on the Idaho City Ranger District of the Boise National Forest in Boise County, Idaho (EPA Region 10 Project Number: 14-0029-AFS).

The 19,327 acre Becker project lies within the Middle Crooked River and Pikes Fork subwatersheds. The identified purpose and need consists of the following four elements:

- contribute to the restoration of low-to-mid elevation forests;
- improve watershed conditions by reducing motorized route related impacts to water resources, fish, soil and habitat;
- improve the quality and diversity of recreational opportunities; and
- provide enhanced recreational opportunities, by utilizing wood products from the suited timber base, and by implementing forest restoration activities.

The FEIS/Record of Decision selected Alternative C with modifications as the action to be implemented. We acknowledge that the ROD provides a useful table clarifying modifications to the alternative. EPA provided comments on the draft EIS raising concerns regarding potential increases to surface water temperature that would result from vegetation treatments within Riparian Conservation Areas and with the lack of a monitoring plan for the project area. While we support the goals of the project, we believe that collecting site specific information for vegetation within RCAs prior to treatments would be beneficial to allow management to modify prescriptions as needed to protect water quality.

We appreciate USFS's staff time, particularly that of the project hydrologist, spent working with us to resolve our concerns. Through this coordination, we gained a better understanding of the current stand conditions and proposed treatments. The EPA also conducted a shade analysis to better understand the implications to shade from the proposed buffers for the Becker project, which we shared with the USFS (email December 18, 2015).

In our analysis, we evaluated different thinning scenarios in both the inner and outer riparian zone, assuming a range of initial canopy cover densities. We used what we believed to be a reasonable range of percent canopy cover conditions and buffer widths in our analysis (we note that the DEIS provided percent canopy cover for only the large size tree class). We evaluated whether the inner no-harvest prescription would result in stream shade loss and affect stream temperature. From our analysis, we

found that the proposed 50 foot inner no-cut zone would be protective if the initial canopy cover was high (80%). At lower initial canopy cover density (60 % and less), a greater width of inner no-cut zone would be needed to avoid increases in stream temperature.

Subsequent to this analysis, the USFS provided information on the relative distribution of tree sizes removed through the <8" dbh thinning prescription, project wide. This information suggests that a high percentage of trees removed (>90%) would be in the < 5" dbh seed/sap class. We believe this reduces the modeled impact of stream shade from the proposed thinning treatment. Nonetheless, we still encourage the Forest to characterize vegetation within the RCA prior to treatment and to identify areas with low initial canopy cover. In these areas we continue to recommend that wider buffers and/or focus on removing the smallest (<5" dbh) size class be considered to maintain and promote an adequate canopy cover in the short and long-term for water quality protection.

We appreciate the opportunity to review the FEIS. If you have question about our comments, please contact me at (206) 553-1601 or by electronic mail at littleton.christine@epa.gov, or you may contact Lynne Hood of my staff at (208) 378-5757 or electronic mail at hood.lynne@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Littleton". The signature is written in a cursive, flowing style.

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit